

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

St. Jude Medical S.C., Inc., a
Minnesota Corporation,

Civil No. 11-cv-327 (MJD/TNL)

Plaintiff,

vs.

Thomas M. Tormey, Jr., a
Resident of the State of New York,

Defendant and
Counterclaim Plaintiff,

and

Tormedco, Inc., a
New York Corporation,

Counterclaim Plaintiff.

**SUPPLEMENTAL DECLARATION
OF EDWARD F. FOX IN SUPPORT
OF RENEWED MOTION FOR
SUMMARY JUDGMENT**

I, Edward F. Fox, declare as follows:

1. I am a shareholder with the law firm of Bassford Remele, P.A., counsel in the above-captioned matter for Plaintiff and Counterclaim Defendant St. Jude Medical S.C., Inc.

2. Attached hereto as **Exhibit V** is a true and correct copy of pertinent excerpts of the transcript of the deposition of Thomas M. Tormey, taken on November 14, 2012.

3. Attached hereto as **Exhibit W** is a true and correct copy of pertinent excerpts of the transcript of the deposition of James Edward Gantz, Jr., taken on November 13, 2012.

4. Attached hereto as **Exhibit X** is a true and correct copy of pertinent excerpts of the transcript of the deposition of James Catlett, taken on November 29, 2012.

5. Attached hereto as **Exhibit Y** is a true and correct copy of a September 30, 2003 email marked as Exhibit 41 in the depositions in this case.

I declare under penalty of perjury the foregoing is true and correct.

Respectfully submitted,

Dated: 3/8/13

s/Edward F. Fox
Edward F. Fox

1220743.docx